Office Supreme Court, U.S.
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NO. 84-1665

IN THE SUPREME COURT OF THE UNITED STATES

OCTOBER TERM 1984

GORDON CAMPBELL, PETITIONER

V.

WASHINGTON STATE BAR ASSOCIATION,

RESPONDENT

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

REPLY BRIEF TO BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

Gordon Campbell,
Petitioner
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BEST AVAILABLE COPY

ARGUMENT

1. Reference is made in respondent's brief in opposition (p. 1) to In re Campbell (1968) 74 Wn2d 276, 444 P.2d 784. It should be noted that the sole basis of the decision in said case is that an attorney, admitted to the practice of law in the state of Washington, cannot bring the type of suit sought to be adjudged constitutional by petitioner's complaint for declaratory judgment herein.

2. Reference is made by respondent to prior petitions for writs of certiorari by petitioner. Since a denial of certiorari is not an expression by the court on the merits, it is evident that petitioner is still seeking to obtain review from the U. S. Supreme court on the important federal question of whether an attorney can enforce his right to work and earn a living by suit.

The 1980 petition for a writ of certiorari involved the question of whether the right to a job is a national political issue involving national legislation, with large groups of people on both sides of the issue, with lawsuits on either side of the issue transcending the range of professional ethics. National Association for the Advancement of Colored People v. Button (1963) 371 U. S. 415, 9 L. Ed.2d 405, 83 S. Ct. 328.

The petition also involved the question of whether an implied right of suit exists to enforce the right to a job under the Full employment and balanced growth act of 1978, which act made statutory the right of every American to a job.

Petitioner's present petition is based upon Davis v. Passman (1979) 442 U. S. 228, 60 L. Ed.2d 846, 99 S. Ct. 2264 upholding the direct right of suit

to enforce the right to work and earn a living under the fifth amendment, petitioner seeking a declaration that a direct right of suit exists to enforce an attorney's right to work and earn a living under the 14th Amendment.

3. Two of the petitions for writs of certiorari (1981 and 1983) referred to by respondent involved a suit for damages arising out of a discovery unrelated to the subject of the present petition.

Gordon Campbell, Petitioner